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April 7, 2008

## VIA FACSIMILE - (914) 390-4179

Honorable Justice Stephen C. Robinson  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

## MEMO ENDORSED

Re: Trustees of the Teamsters Local 456 et al. vs. Realife Land Improvement, Inc.  
Docket No. 07 CIV 3468 (SCR)

Dear Honorable Judge Robinson:

This firm represents Plaintiff Trustees in the above-referenced matter. I write to request the Court's permission to file a motion for entry of default in this lawsuit.

A summons and complaint were filed on May 11, 2007. Through its former counsel, defendant filed an answer to the complaint but subsequently withdrew as counsel of record on November 27, 2007. By Order of this Court, the entire matter was stayed for a 30-day period in order to afford Defendant an opportunity to retain new counsel.

As of this date, we have not been contacted by new counsel and I am unaware of any appearance by substituted counsel.

Accordingly, I request permission to file a motion for default in order to remove this matter from the Court's docket.

Thank you for your assistance and courtesies.

Very truly yours,

BARNES, IACCARINO,  
VIRGINIA, AMBINDER &  
SHEPHERD, PLLC

APPLICATION GRANTED

*Stephen C. Robinson*

HON. STEPHEN C. ROBINSON

By: *Karin Arrospeide*

Karin Arrospeide, Esq.

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